



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

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April 13, 2023

**BY ECF**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *V.B. obo C.M. v. N.Y. City Dep't of Educ.*  
Index No. 22 CV 9555 (RA)(JLC)

Dear Judge Abrams:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York and attorney for the Defendant New York City Department of Education in the case referenced above. I write to respectfully request a short extension of time for the Department to serve and file its papers in opposition to Plaintiffs' motion for summary judgment.

Pursuant to the Court's Order dated March 27, 2023, the Department of Education is due to serve and file its opposition by today, April 13, 2023. I write to respectfully request an extension to Tuesday, April 18, 2023. Additional time is needed because my liaisons at the Department of Education are unexpectedly unavailable today and are unable to review and sign off on the final version of our papers. I apologize for the timing of this request, but I only learned of this issue earlier today.

This is the first extension request made by the Department in connection with this motion practice. I attempted to contact Noelle Boostani, Esq., Plaintiffs' attorney, but I did not hear back from her (in fairness, I only reached out to her earlier today). If the Department's request is granted, we respectfully request that a corresponding extension be granted for Plaintiffs' reply papers (which are presently due by April 27, 2023).

Thank you for your consideration of this matter.

Respectfully submitted,

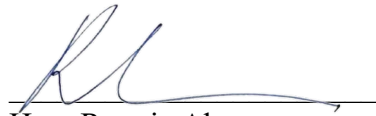
s/

Andrew J. Rauchberg  
Assistant Corporation Counsel

cc: Noelle Boostani, Esq.  
Law Office of Noelle Boostani  
Attorneys for Plaintiff

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ronnie Abrams', is written over a horizontal line.

Hon. Ronnie Abrams  
April 14, 2023